

DeltaKeeper

A PROJECT OF SAN FRANCISCO BAYKEEPER

2 July 1997

JUL 11 1997

Mr Lester A. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Delta Water Quality Monitoring Program

Dear Mr. Snow:

We are writing to express our growing concern that CALFED is on the threshold of approving projects to improve Delta water quality conditions without first prioritizing problems according to their environmental risks, establishing a comprehensive and aggressive program to improve our understanding of water quality-induced beneficial use impairments and developing an inclusive technical process to evaluate the effectiveness of such projects. We appreciate the enormous burden assumed by those with decision making responsibilities to distribute the largest amount of money ever earmarked for the Delta. We also understand that certain high-priority projects should immediately proceed, for example, full implementation of all requirements of the Central Valley Project Improvement Act. However we are disturbed that CALFED may be putting the cart before the horse in approving projects relating to water quality improvements without prioritizing them according to sound scientific criteria. Such an approach risks wasting scarce public funds for projects that may have limited effectiveness in addressing real issues of beneficial use impairment in the Delta.

For example, aquatic life toxicity in the Delta and its tributaries is one of the most important, if not the most important, water quality problem facing the Delta. While many people have focused attention on habitat destruction and excessive pumping of Delta water for export as the principal causes of fisheries decline, it is highly likely that aquatic life toxicity also plays a major role in affecting the health of the Delta ecosystem for a number of key species. Unfortunately, too little effort is being made today to address the issue of aquatic life toxicity in the Delta and its tributaries.

Currently, there is no water quality monitoring program in the Delta comparable to the San Francisco Estuary Institute's (SFEI) Regional Monitoring Program in San Francisco Bay or the project envisioned for the Sacramento River by the Sacramento River Toxic Pollutant Control Program. Given the limited data available on the chemical constituents and pathogenic organisms in the Delta and poor information on real impacts to identified beneficial uses, creation of a comprehensive monitoring project is a crucial first step to the success of any Delta restoration effort.

CMARD

52

✓

Lester Snow, CALFED, Water Quality Monitoring, July 1997, page 1.
3536 Rainier Avenue
Stockton
CA 95204

Printed on recycled paper ♻

Telephone: 209 464 5090
Facsimile: 209 464 5174
Hotline: 1 800 KEEPBAV

We ask that CALFED immediately take steps to fund and implement projects which include:

1. A Delta monitoring program, perhaps modeled after SFEI's successful program, that regularly collects and analyzes constituents in the sediment and water column at a sufficient number of pre-selected sites throughout the Delta. Sufficient provision must be made for bioassays on local and surrogate species and Toxicity Identification Evaluations on samples exhibiting toxicity. The monitoring program must be iterative and of sufficient duration to provide for long-term trend analysis and be flexible enough to permit follow-up on routine and episodic sampling results. It must provide for the long-term evaluation of the impacts and effectiveness of remediation approaches. In addition, the monitoring should be designed to provide data that can be integrated with data from tributary rivers and the Bay, so that a landscape-level evaluation of environmental quality can be performed. ✓ 52
2. Special studies during periods of high intensity runoff, extensive pesticide application and anadromous fish spawning and early recruitment to develop a better understanding of the transport, fate and effects of contaminants. ✓
3. Fish tissue studies and human health risk assessments to develop scientifically defensible, site specific human health advisories. Data should be collected on local species commonly consumed by local populations. Since available information indicates that local consumption rates likely exceed the national average, a special effort should be made to determine actual consumption rates by subsistence fishermen. ✓
4. A bioassessment component to better define the effects of non-chemical discharges (e.g. sedimentation and habitat degradation). ✓
5. A central data collection point that assembles, maps and publishes historic and current monitoring data in a usable and easily understood format. All data must be conveniently accessible by government agencies, researchers and the general public. ✓

Any Delta monitoring project should be conducted in collaboration with existing San Francisco Bay and Sacramento River monitoring programs and should extend up the San Joaquin River and East-side tributaries. Monitoring projects should be accountable to an independent oversight board that includes public members and which has the latitude to initiate target studies as additional use impairments are identified. Where monitoring results demonstrate clearly defined potential problems, the oversight committee should have the responsibility to recommend a course of action to the appropriate authorities. To encourage buy-in by citizens groups and local communities and to maximize limited resources, provision should be provided for the training and funding of volunteer monitoring efforts and educational programs. Finally, a properly formulated risk assessment process is necessary to prioritize projects that are technically valid and cost-effective. ✓

We reiterate that we strongly believe that a comprehensive monitoring program is fundamental to the success of CALFED efforts in the Delta and that the focus of that program should be directed toward identifying and evaluating actual water quality beneficial-use impairments, then documenting the improvements achieved. [These impairments are inadequately addressed in the

Lester Snow, CALFED, Water Quality Monitoring, July 1997, page 2.

draft CALFED program and include, among others: aquatic toxicity, dissolved oxygen depletion, reduced quality of domestic water supplies, excessive eutrophication, chemical bioaccumulation, pathogenic impairment of contact recreation and sediment impairment (i.e. excessive accumulation, oil and grease, litter and toxicity). All proposed projects considered for funding by CALFED should be prioritized according to their potential effectiveness in resolving impairments to identified beneficial uses. Such an approach will be the wisest use of limited financial resources.

We hope these comments are of value and look forward to discussing these and other issues with you in the near future.

Sincerely,
Bill Jennings, DeltaKeeper



Mike Lozeau, San Francisco BayKeeper



The following individuals have reviewed and commented on this letter and authorized the use of their signatures.

Jim Crenshaw
President
California Sportfishing Protection Alliance

Waldo Holt
Conservation Chair
San Joaquin Audubon Society

Bradley Angel
Southwest Toxics Campaigner
Greenpeace U.S.A.

Barry Nelson
Executive Director
Save San Francisco Bay Association

Bill Walker
California Director
Environmental Working Group

John Beuttler
Executive Director
United Anglers of California

Jim Edmondson
Executive Director
California Trout

Russell Long, Ph.D.
Director
Bluewater Network

John Knox
Executive Director
Earth Island Institute

Ralph Dodson
Chairman
California Striped Bass Association

Marguerite Young
California Program Director
Clean Water Action

Arthur Feinstein
Executive Director
Golden Gate Audubon

Lester Snow, CALFED, Water Quality Monitoring, July 1997, page 3.

Dan Silver, Coordinator
Endangered Habitats League
Los Angeles, CA

Warner Chabot
Pacific Region Director
Center For Marine Conservation

Lloyd Carter
President
California Save Our Streams

Ed Maschke
Executive Director
California Public Interest Research Group

Linda Conklin
Chairperson
People For Healthy Forests

Greg Small
Pesticide Watch Education Fund

Sharon J. Leach
Contributing Editor: Terrain
Author: "Breast Cancer by the Bay"

Robert Shanks
District Engineer
Sacramento Regional County Sanitation District

Ellen Hickey
Information and Publications Coordinator
Pesticide Action Network North America
Regional Center, San Francisco

Henry Clark
Executive Director
West County Toxics Coalition

Greg Karras
Senior Scientist
Communities For A Better Environment

John Merz
Chairman
Sacramento River Preservation Trust

Jonathan Kaplan
Environmental Advocate
California Public Interest Research Group

Lyndi Swanson, President
Friends of Five Creeks
Albany, CA

Karen Susag
Toxics Link Coalition

Martin Bourque
Sustainable Agriculture Program Director
Institute for Food and Development Policy

Jonathan Parfrey, Director
Physicians For Social Responsibility
Los Angeles, CA